

Hearing Date and Time: June 21, 2011
at 10:00 a.m.

JAECKLE FLEISCHMANN & MUGEL, LLP

12 Fountain Plaza, Suite 800

Buffalo, New York 14202

Tel: 716.856.0600

Fax: 716.856.0432

Beverley S. Braun, Esq. (admitted *pro hac vice*)

bbraun@jaeckle.com

Attorneys for Jamestown Container Corporation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Chapter 11
)	
DPH HOLDINGS CORP., <i>et al.</i> ,)	No. 05-44481 (RDD)
)	
Debtors.)	Jointly Administered
_____)	
)	
DELPHI AUTOMOTIVE SYSTEMS, LLC,)	
)	
Plaintiff,)	
)	Adv. Pro. No. 07-02322
-against-)	
)	
JAMESTOWN CONTAINER CORP.,)	
)	
Defendant.)	
_____)	

**JAMESTOWN CONTAINER'S SUR-REPLY IN SUPPORT OF ITS
OBJECTION TO THE REORGANIZED DEBTORS' MOTION FOR
LEAVE TO FILE AMENDED COMPLAINTS**

Defendant Jamestown Container Corporation, by and through counsel, hereby submits
this Sur-Reply in further support of its Objection to the Reorganized Debtors' Motion for Leave
to File Amended Complaints.

BACKGROUND

1. On September 7, 2010 DPH Holdings Corporation and certain of its affiliated reorganized debtors (the "Reorganized Debtors") filed a Motion for Leave to File Amended Complaints (hereinafter the "Motion").

2. On November 24, 2010, Jamestown Container Corporation filed its Objections to the Motion.

3. On January 28, 2011, the Reorganized Debtors filed an Omnibus Reply in Further Support of the Motion.

OBJECTION

4. In the interest of judicial economy, Jamestown Container Corporation joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in all Sur-Replies of those parties who are similar situated, including but not limited to the Sur-Reply of Johnson Controls, Johnson Controls Battery Group, and Johnson Control, Inc. (Docket No. 21312); the Sure-Reply of Method Electronics, Inc (Docket No. 21319); and the Sur-Reply of Ex-Cell-O Machine Tools, Inc. (Docket No. 21321). Jamestown Container Corporation reserves its right to supplement this Sur-Reply, including but not limited to providing documentary evidence, and to appear at any and all hearings and conferences scheduled on the Motion.

Respectfully submitted,

Dated: Buffalo, New York
June 14, 2011

JAECKLE FLEISCHMANN & MUGEL, LLP

By: /s/ Beverley S. Braun

Beverley S. Braun, Esq. (admitted *pro hac vice*)
12 Fountain Plaza, Suite 800
Buffalo, New York 14202
Tel: 716-856-0600
Fax: 716-856-0432
bbraun@jaeckle.com

Counsel to Jamestown Container Corp.